

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:23-CR-00256-RLW (SRW)
)	
EDDIE LOVE,)	
)	
Defendant.)	

GOVERNMENT’S DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Angie E. Danis and Thomas S. Rea, Assistant United States Attorneys for said District, and makes the following additional disclosures pursuant to Rule 12(b)(4) of the Federal Rules of Criminal Procedure:

At trial, the Government intends to use evidence seized and statements made by the defendants during the events described below. This evidence and these statements are more fully set forth in investigative reports, which will be made available to the defendant. To the extent that any evidence outlined herein constitutes evidence of “Crimes or Other Acts” as contemplated by Federal Rule of Evidence 404(b), notice is hereby given that the Government intends, in the event of trial, to seek the admission of such evidence as probative of “motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, or lack of accident.”

In connection with this filing, the Government moves for pretrial determination of admissibility of arguably suppressible statements made by the defendants. The listing of a potential witness or potential witnesses is not meant to be all-inclusive. As the date set for hearings approaches, the Government may add, substitute, or delete a witness or witnesses for various reasons.

The Government has not included in its listing of events the various physical surveillance that occurred or any photographs or videotapes taken during surveillance during the course of the investigation. Additionally, the Government has not listed any records obtained by subpoena. It is the Government's position that these events are not subject to suppression.

DATE	EVENT/ITEM	WITNESS
May 9, 2023	Pen Register/Trap-and-Trace/Precision Location Information for (314) 565-4582 (4:23MJ9067 RHH)	FBI TFO David Rudolph
May 10, 2023	Pen Register/Trap-and-Trace/Precision Location Information for (314) 546-9688 ATT (Charles Webster) (4:23MJ9072 RHH)	FBI TFO David Rudolph
May 10, 2023	Pen Register/Trap-and-Trace/Precision Location Information for (314) 546-9688 TMOBILE (Charles Webster) (4:23MJ907 RHH)	FBI TFO David Rudolph
May 10, 2023	Search Warrant for Premises Located at STL on the Rocks Bar & Grill, 10086 Page Avenue, St. Louis, Missouri 63132 (4:23MJ9074 RHH)	FBI TFO David Rudolph
May 11, 2023	Cell Site Simulator for (314) 546-9688 (Charles Webster) (4:23MJ9092 RHH)	FBI SA Christopher Faber

May 11, 2023	Search Warrant for Silver/Gray Volkswagen Passat bearing Missouri License Plate ZG2-D5S (4:23MJ9104 RHH)	FBI TFO David Rudolph
May 11, 2023	Search Warrant for Premises Located at 1247 Bosworth Drive, St. Louis, Missouri 63137 (4:23MJ9090 RHH)	FBI SA Christopher Faber
May 11, 2023	Search Warrant for Premises Located at 11170 Ruesta Drive, Apartment 6, St. Louis, Missouri 63138 (4:23MJ9091 RHH)	FBI SA Christopher Faber
May 12, 2023	Arrest and Interviews of Charles Webster	FBI TFO David Rudolph; FBI SA Matthew Baughn
May 12, 2023	Arrest and Interview of Eddie Love	FBI TFO David Rudolph
May 16, 2023	Search Warrant for silver/gray Ford SUV bearing Missouri License Plate EF9D4V (4:23MJ8107 SRW)	FBI TFO David Rudolph
May 16, 2023	Search Warrant for a burgundy Nissan Murano bearing Missouri temporary License Plate 06NCNE (4:23MJ8108 SRW)	FBI TFO David Rudolph
May 17, 2023	Search Warrant for infotainment system associated with a 2014 silver/gray Volkswagen Passat bearing Missouri License Plate ZG2-D5S (4:23MJ1188 JMB)	FBI TFO David Rudolph
May 17, 2023	Search Warrant for DNA Sample of Charles Webster (4:23MJ1189 JMB)	FBI TFO David Rudolph
May 17, 2023	Search Warrant for DNA Sample of Eddie Love (4:23MJ1190 JMB)	FBI TFO David Rudolph
May 23, 2023	Search Warrant for Subject Electronic Device #1, a black LG Mobile Device (4:23MJ3166 NCC)	FBI TFO David Rudolph

In addition to the above-referenced evidence, the Government may seek to admit at trial various documentary and/or business records, including but not necessarily limited to records

obtained from various providers of cellular telephone service. It is the Government's position that these records do not constitute "suppressible evidence," but since the Court's order required disclosure of any "arguably suppressible evidence," the Government hereby gives notification of its intent to admit evidence in the form of such business records.

As additional evidence is found, and as supplemental information comes to the Government's attention, the Government may choose not to use some evidence described, or to use evidence additional to that listed in these reports. If the Government chooses to use additional evidence, a supplemental Rule 12(b)(4) notice, and/or a Notice of Intent to Seek the Admission of Evidence Pursuant to Federal Rule of Criminal Procedure 404(b) will be filed.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Angie E. Danis

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CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2023 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record for the defendant.

/s/ Angie E. Danis

ANGIE E. DANIS, #64805MO
Assistant United States Attorney